## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: :

Case No.: 10-24156-JAD

PATSY M. MARANO, : Judge Jeffery A. Deller

SSN: XXX-XX-6946

*Debtor*, : Chapter 13 : Doc. No.

PATSY M. MARANO :

Movant,

VS.

PARRY CUSTOM HOMES :

:

Respondent, :

## MOTION FOR ORDER TO PAY TRUSTEE PURSUANT TO WAGE ATTACHMENT

AND NOW comes the Debtor, by and through the Debtor's Attorney, MICHAEL S. GEISLER, and represents the following:

- 1. A Chapter 13 case was filed on 6/8/2010.
- 2. It appears that the Debtor, PATSY M. MARANO, receives regular income which may be attached under 11 USC Section 1326 to fund the Chapter 13 plan.
- 3. The likelihood of success in the case will be much greater if the Debtor's income is attached to fund the plan.

WHEREFORE the Debtor, PATSY M. MARANO, respectfully requests that this Court enter an order to pay Trustee in the form attached.

DATED: 3/1/2011

/s/ Michael S. Geisler

MICHAEL S. GEISLER, ESQUIRE Pa. I.D No. 39414

Attorney for Debtor 410 Jonnet Building Monroeville, PA 15146 Tele: (412) 372-2820

## **CERTIFICATE OF SERVICE**

I, MICHAEL S. GEISLER, ESQUIRE, hereby certify that I have served a true and correct copy of the within Motion upon the following, by First Class Mail, postage prepaid:

RONDA J. WINNECOUR, TRUSTEE 3250 US Steel Tower Pittsburgh, PA 15219

PARRY CUSTOM HOMES Attn: Payroll Manager 10349 Route 30

North Huntingdon, PA 15642

/s/ Michael S. Geisler DATED: 3/1/2011

MICHAEL S. GEISLER, ESQUIRE

Pa. I.D No. 39414

Attorney for Debtor 410 Jonnet Building Monroeville, PA 15146 Tele: (412) 372-2820